

## EXHIBIT D – Budget & Staffing Plan

### Budget for Compensation Period

	<b>Project Category Description</b>	<b>Estimated Hours</b>	<b>Estimated Fees</b>
1.	Litigation Consulting: CCAA Recognition Proceedings	450	CAD \$300,000.00
2.	Fee and Retention Application	75	CAD \$40,000.00
3.	Litigation: Canadian Actions	0	
8.	Litigation: General / All Class Actions	0	

### Staffing Plan

<b>Category of Timekeeper</b>	<b>Projected Number of Timekeepers during the Compensation Period</b>	<b>Actual Number of Timekeepers During the Compensation Period</b>	<b>Average Hourly Billing Rate</b>
Partner	6	5	CAD \$841.40
Associate	6	5	CAD \$526.40
Paralegal	1	1	CAD \$378.00
Articling Student	3	2	CAD \$290.50